

**Exhibit 30**  
**(Unsealed)**  
**(Previously Filed Under Seal as Dkt. 438)**

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY  
TAMRA PAWLOSKI - 01/18/2019

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

3 -----x

4 FAIR ISAAC CORPORATION, a Delaware  
corporation,

5 Plaintiff,

6 Case No. 16-cv-1054

7 v.

8 FEDERAL INSURANCE COMPANY, an  
Indiana corporation, and ACE  
9 AMERICAN INSURANCE COMPANY, a  
Pennsylvania corporation,  
10 Defendants.

11 -----x

12 8:30 a.m.  
January 18, 2019

13 767 Third Avenue  
14 New York, New York

15 \* CONFIDENTIAL \*

16 DEPOSITION of TAMRA PAWLOSKI, a Plaintiff  
17 in the above entitled matter, pursuant to Notice,  
18 before Stephen J. Moore, a Registered Professional  
19 Reporter, Certified Realtime Reporter and Notary  
20 Public of the State of New York.

21

22 Job No. MP-204293



## HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

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Pages 230..233

<p style="text-align: right;">Page 230</p> <p>1 3:35 p.m. and we are going off the</p> <p>2 record.</p> <p>3 (At this point in the proceedings</p> <p>4 there was a recess, after which the</p> <p>5 deposition continued as follows:)</p> <p>6 THE VIDEOGRAPHER: This is the</p> <p>7 start of media labeled number 6. The</p> <p>8 time now is 3:43 p.m. and we are back on</p> <p>9 the record.</p> <p>10 Q So, you mentioned a few times</p> <p>11 that after February or March of 2016 in the</p> <p>12 negotiations with FICO that it went up the</p> <p>13 chain to senior leadership.</p> <p>14 Who were the people that you are</p> <p>15 referring to in that senior leadership group?</p> <p>16 A Bill Harlam, Rob Hilgan, Kevin</p> <p>17 Shirran and Andrew Hopp.</p> <p>18 Q Andrew Hopp is the general</p> <p>19 counsel, is that correct?</p> <p>20 A That's correct.</p> <p>21 Q Bill Harlam was the CIO?</p> <p>22 A No, Bill was my boss, he was the</p>	<p style="text-align: right;">Page 232</p> <p>1 discussed relating to Australia with Russ</p> <p>2 Hodey.</p> <p>3 Were those the e-mails at</p> <p>4 Exhibits 268 and 269?</p> <p>5 A No, they were the ones in an</p> <p>6 earlier, that we did -- hold on a second, I</p> <p>7 think it was Exhibit 244.</p> <p>8 And what is he asking? Not 244,</p> <p>9 I'm sorry. It was 241 and 243.</p> <p>10 Q So I note your -- in Exhibit 241</p> <p>11 your response was that the license was not</p> <p>12 worldwide, correct?</p> <p>13 A Yes, but then shortly after, as</p> <p>14 stated, that was corrected.</p> <p>15 Q An it was corrected by Mark?</p> <p>16 A Berthume.</p> <p>17 MS. KLIEBENSTEIN: All right. No</p> <p>18 further questions.</p> <p>19 MR. FLEMING: I have just a</p> <p>20 couple of follow-up relating to Exhibit</p> <p>21 260.</p> <p>22</p>
<p style="text-align: right;">Page 231</p> <p>1 head of vendor management.</p> <p>2 Q Who is Rob Hilgan?</p> <p>3 A Rob Hilgan was Bill's boss.</p> <p>4 Q What was his role?</p> <p>5 A Operations.</p> <p>6 Q Chief of operations?</p> <p>7 A Yeah -- no, he wasn't the Chief</p> <p>8 Operating Officer, he just had IT operations.</p> <p>9 Q And Kevin Shirran, who was that</p> <p>10 and what was his role?</p> <p>11 A Officially our CIO, global CIO.</p> <p>12 Q Now, when we were looking at</p> <p>13 Exhibit -- the very last exhibit with the CHear</p> <p>14 report, we were talking about the Blaze Advisor</p> <p>15 being approved for use in Evolution and Russ</p> <p>16 Hodey was the IT application contact.</p> <p>17 Do you recall that?</p> <p>18 A Yes.</p> <p>19 I'm sorry, here we go.</p> <p>20 Q I wanted to cross-reference that</p> <p>21 to other exhibits. You mentioned that it</p> <p>22 probably related to the e-mails we had already</p>	<p style="text-align: right;">Page 233</p> <p>1 EXAMINATION BY</p> <p>2 MR. FLEMING:</p> <p>3</p> <p>4 Q My question --</p> <p>5 MS. KLIEBENSTEIN: Hold on just a</p> <p>6 second. Let me see 260, please.</p> <p>7 Q What knowledge do you have that</p> <p>8 FICO knew that Chubb deployed Blaze in the</p> <p>9 United Kingdom?</p> <p>10 A I worked on a statement of work</p> <p>11 with -- where two of the consultants from FICO</p> <p>12 were sent to the U.K. to install and to do an</p> <p>13 assessment and then an installation of the FICO</p> <p>14 product, Blaze product.</p> <p>15 Q And who prepared the statement</p> <p>16 of work?</p> <p>17 A It was joint between the</p> <p>18 business partner, myself and FICO.</p> <p>19 Q And who at FICO was working on</p> <p>20 this?</p> <p>21 A I know it wasn't Mike Sawyer,</p> <p>22 because he wasn't there at the time, I don't</p>

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Pages 234..237

<p style="text-align: right;">Page 234</p> <p>1 believe.</p> <p>2 I don't recall who the -- one of</p> <p>3 the salesmen.</p> <p>4 Q Is it Russ Schreiber?</p> <p>5 A Yes.</p> <p>6 Q Did you have any discussions</p> <p>7 with Russ Schreiber as to whether use of Blaze</p> <p>8 by Chubb in the United Kingdom was permissible</p> <p>9 under the agreement?</p> <p>10 A No, because I wouldn't have</p> <p>11 thought they would send consultants there if it</p> <p>12 was not permissible.</p> <p>13 Q So if you just walk through the</p> <p>14 process of why there was a statement of work</p> <p>15 and how that was proposed, just the timeline.</p> <p>16 A So, what will happen is we will</p> <p>17 get a request from the business asking us if --</p> <p>18 to put together the SOW.</p> <p>19 I would contact FICO to arrange</p> <p>20 that, and it is practice at Chubb that the</p> <p>21 business also contacts FICO to go over what</p> <p>22 their requirements are so the two of them can</p>	<p style="text-align: right;">Page 236</p> <p>1 wanted to make sure that we were putting FICO</p> <p>2 in correctly, so, the assessment and</p> <p>3 installation.</p> <p>4 Q And what was your understanding</p> <p>5 as to what they installed?</p> <p>6 A It was clear that was -- it was</p> <p>7 the Blaze Advisor product.</p> <p>8 Q Where was it installed?</p> <p>9 A In the U.K. data center on, I</p> <p>10 believe our mainframe in the U.K.</p> <p>11 Q At any point during that process</p> <p>12 did anybody from FICO suggest that the use or</p> <p>13 installation of Blaze in the United Kingdom was</p> <p>14 outside the scope of the sales force license</p> <p>15 agreement?</p> <p>16 A No.</p> <p>17 MR. FLEMING: Okay, I have no</p> <p>18 further questions.</p> <p>19</p> <p>20 CONTINUED EXAMINATION BY</p> <p>21 MS. KLIEBENSTEIN:</p> <p>22</p>
<p style="text-align: right;">Page 235</p> <p>1 agree.</p> <p>2 I'm on some of those calls and</p> <p>3 not on some of those calls.</p> <p>4 Then what we do is we take what</p> <p>5 has been agreed and put it into a statement of</p> <p>6 work and ensure that statement of work is</p> <p>7 correct, including what's going to be delivered</p> <p>8 and the deliverables, and from there it gets</p> <p>9 signed.</p> <p>10 Q And then what happens next?</p> <p>11 A Then the SOW goes to the</p> <p>12 business partner for them to work on, so they</p> <p>13 contact FICO and the consultants go to wherever</p> <p>14 they need to go.</p> <p>15 Q And did you understand that two</p> <p>16 FICO representatives went to London?</p> <p>17 A Yes, that was outlined in the</p> <p>18 SOW.</p> <p>19 Q And what was your understanding</p> <p>20 of what did they do in London?</p> <p>21 A They were the architects that</p> <p>22 helped with the assessment, and then also we</p>	<p style="text-align: right;">Page 237</p> <p>1 Q So the event you were just</p> <p>2 talking about, when did this occur?</p> <p>3 A 2011, yes, 2011 or 2012; I</p> <p>4 believe it was 2011.</p> <p>5 Q Were you in the United</p> <p>6 Kingdom --</p> <p>7 A No.</p> <p>8 Q -- when the work was being done?</p> <p>9 A No.</p> <p>10 Q So when you are talking about</p> <p>11 the installation and the assessment, you</p> <p>12 weren't personally there?</p> <p>13 A No, that was managed by the</p> <p>14 business.</p> <p>15 Q And how did you come across that</p> <p>16 knowledge?</p> <p>17 A In the statement of work that</p> <p>18 was signed off by two -- by both companies as</p> <p>19 to what was going to be delivered, and then</p> <p>20 before payment, I validated that it happened.</p> <p>21 Q So these were tasks that were</p> <p>22 outlined in the statement of work?</p>

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Pages 238..241

<p style="text-align: right;">Page 238</p> <p>1 A Correct.</p> <p>2 Q A written statement of work?</p> <p>3 A Yes.</p> <p>4 Q Do you know if that statement of</p> <p>5 work has been produced in this lawsuit?</p> <p>6 A I don't know.</p> <p>7 I know it wasn't one of the ones</p> <p>8 that you have shown me.</p> <p>9 Q Did anyone from Chubb &amp; Sons</p> <p>10 check with legal to make sure that what was</p> <p>11 going to happen -- well, was the SOW Chubb &amp;</p> <p>12 Sons' standard SOW?</p> <p>13 A It was.</p> <p>14 Q So it wouldn't have gone to</p> <p>15 Chubb &amp; Sons' legal?</p> <p>16 A That's correct.</p> <p>17 Q Do you know whether it went</p> <p>18 through FICO's legal department?</p> <p>19 A I do not know.</p> <p>20 Q Do you know if Mr. Schreiber</p> <p>21 checked with FICO legal?</p> <p>22 A I do not, no.</p>	<p style="text-align: right;">Page 240</p> <p>1 involve?</p> <p>2 A This one was a CPI print</p> <p>3 application.</p> <p>4 Q That's the name for it?</p> <p>5 A Yes, I believe that was -- I</p> <p>6 knew it had to do something with print.</p> <p>7 Q Do you know one way or the other</p> <p>8 whether Blaze Advisor was installed on servers</p> <p>9 in the United Kingdom pursuant to this</p> <p>10 statement of work?</p> <p>11 A Yes.</p> <p>12 Yes, it was installed, because</p> <p>13 they gave me validation when we were paying the</p> <p>14 invoice.</p> <p>15 Q What was that validation?</p> <p>16 A That the deliverables outlined</p> <p>17 in that SOW were completed.</p> <p>18 Q Who gave that you validation?</p> <p>19 A The project manager.</p> <p>20 Q And who is the project manager?</p> <p>21 A I don't remember.</p> <p>22 MS. KLIEBENSTEIN: All right, I</p>
<p style="text-align: right;">Page 239</p> <p>1 Q You mentioned briefly you don't</p> <p>2 recall any discussions with respect to this</p> <p>3 statement of work as to whether it was okay</p> <p>4 under the agreement, correct?</p> <p>5 A Yeah, I don't recall.</p> <p>6 Q But there weren't -- you don't</p> <p>7 recall discussions one way or the other,</p> <p>8 whether this was or was not okay?</p> <p>9 A That's correct, I don't recall.</p> <p>10 Q And so what was your role with</p> <p>11 respect to this statement of work?</p> <p>12 A I helped to draft it on to the</p> <p>13 template and work it through the process that</p> <p>14 we have outlined, that I have outlined a couple</p> <p>15 of times already.</p> <p>16 So, getting it through to</p> <p>17 signature, making sure everybody was agreed</p> <p>18 with what the business terms were in the SOW,</p> <p>19 agree with the pricing, and got a final</p> <p>20 signature approval for it.</p> <p>21 Q And what application -- what</p> <p>22 software application did the statement of work</p>	<p style="text-align: right;">Page 241</p> <p>1 don't have any further questions.</p> <p>2 MR. FLEMING: Nothing further.</p> <p>3 We will read and sign.</p> <p>4 THE VIDEOGRAPHER: The time is</p> <p>5 3:58 p.m. and we are going off the</p> <p>6 record.</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>